

**GLOBAL NATURAL GAS VENTURES LLC**

January 22, 2019

The Honorable Chief Judge Joe Heaton  
United States District Court for the Western District of Oklahoma  
200 NW 4th Street  
Oklahoma City, OK 73102

Subject: Notice of Supplemental Authorities in *Carter Page v. DNC et al*, Case No.  
CIV-18-1019-HE

Dear Judge Heaton:

I write in accordance with LCvR7.1(m) to provide the Court with several supplemental authorities that U.S. Congressional proceedings made available last week. The Defendants' Reply Motion on Friday (Dkt. No. 26) referred to the Plaintiff's "recycled conspiracy theories". But as demonstrated *infra*, senior current and incoming officials on the Judiciary Committees of both chambers in Congress and the U.S. Department of Justice have continued to provide further evidence which refutes the Defendants' conclusory allegations related to their illegal activities in 2016 (*Id.*):

- (A) **U.S. Attorney General-nominee William Barr's promise to investigate Defendants' Dodgy Dossier (Exhibit 1)**<sup>1</sup> – In a January 15th, 2019 confirmation hearing, Mr. Barr promised to fulfill a request from U.S. Senate Judiciary Committee Chairman Lindsey Graham that the Justice Department look into the reliability of the Defendants' false evidence which led to abuse of process in the U.S. Foreign Intelligence Surveillance Court in 2016 and "hold people accountable if it was not".
- (B) **Criminal leak investigation related to Defendants' alleged misconduct and conspiracy with the FBI (Exhibit 2)**<sup>2</sup> – Earlier U.S. Congressional proceedings have previously revealed alleged coordination between Defendant Michael Sussmann and former FBI General Counsel James Baker. Plaintiff's Complaint (¶¶ 29, 43-44) and Memorandum of Law (Dkt. No. 22, ECF p. 38) included such initial allegations from Article I Committees. As of last week, correspondence with the U.S. Attorney for the District of Connecticut has now confirmed that these media-related actions are under criminal investigation. Mr. Baker also discussed the potentially unprecedented nature of his interactions with Defendant Mr. Sussmann in his alleged Congressional testimony: *Congressman Jordan*: [This] is the first time and to your recollection the only time an outside counsel had information and was wanting to make sure it got to the general counsel of the FBI, and it happened to deal with the Russia investigation.

---

<sup>1</sup> Matt Naham, "William Barr Made Some Big Promises to Lindsey Graham, Including a Strzok/Page Investigation," Law & Crime, January 15th, 2019. <https://lawandcrime.com/high-profile/william-barr-made-some-big-promises-to-lindsey-graham-including-a-strzok-page-investigation/>

<sup>2</sup> Ranking Member of U.S. House Oversight Committee Jim Jordan and Congressman Mark Meadows, Letter to U.S. Attorney John H. Durham, January 15, 2019. <https://republicans-oversight.house.gov/wp-content/uploads/2019/01/2019-01-15-JDJ-MM-to-Durham-re-briefing.pdf>

*Mr. Baker:* I think that's correct. Sitting here today, that's the only one I can remember.<sup>3</sup>

(C) **Other Elements of Defendants' In-State Relationships: Ongoing Criminal Investigations** - In the creation and distribution of their dangerous and defamatory Dodgy Dossier, each of the Defendants could easily "foresee its possible use in Oklahoma." *World-Wide Volkswagen Corp v. Woodson*, 444 U.S. 291 (1980). Although I believe my pleadings make general and specific jurisdiction abundantly clear, additional factual material is available if the Court might have any doubt about the personal jurisdiction over each of the Defendants in this civil action. Government sources previously leaked to the *Washington Post* that I was interviewed at length by agents of the FBI's Counterintelligence Division in March 2017 on matters stemming from the false allegations produced and distributed by the Defendants in their Dodgy Dossier.<sup>4</sup> But as outlined in ¶ (A) and (B), *supra*, federal authorities who have debunked the Defendants' libel are now instead looking into numerous matters related to crimes committed against the Plaintiff. Although my discussions with FBI Counterintelligence stemming from the tortious activities by the Defendants in this civil action were illegally disclosed, I wish to continue my support of ongoing law enforcement investigations by protecting the integrity of their operations. See, e.g., *Virginia Dep't of State Police v. Washington Post*, 386 F.3d 567, 579 (4th Cir. 2004) ("[A] compelling governmental interest exists in protecting the integrity of an ongoing law enforcement investigation.") However, several of my 2017 interviews with FBI Counterintelligence were directly related to the damages created by the Defendants within the jurisdiction of the state of Oklahoma. If necessary in the case of any remaining jurisdictional uncertainties, Plaintiff can make additional Oklahoma-specific information and/or an associated supplemental brief available upon the request of the Court; preferably under seal to protect the integrity of ongoing law enforcement investigations.

In other Article III Court proceedings last week, Judge Leon denied a similar Motion to Dismiss by subcontractors of this civil action's Defendants who had assisted them as servants in the creation and dissemination of their defamatory Dodgy Dossier. *Fridman et al v. Bean LLC et al*, 17-cv-2041-RJL, Dkt. No. 48 (D.D.C., Jan. 15, 2019). This new legal analysis and order is also included as a further supplemental authority in Exhibit 3, *infra*.

Very respectfully,



Carter Page, Ph.D.

<sup>3</sup> Jeff Carlson, "EXCLUSIVE: Transcripts of Former Top FBI Lawyer Detail Pervasive Abnormalities in Trump Probe," *Epoch Times*, January 19, 2019. [https://www.theepochtimes.com/transcripts-of-former-top-fbi-lawyer-detail-pervasive-abnormalities-in-trump-probe\\_2771370.html](https://www.theepochtimes.com/transcripts-of-former-top-fbi-lawyer-detail-pervasive-abnormalities-in-trump-probe_2771370.html)

<sup>4</sup> Devlin Barrett, "FBI has questioned Trump campaign adviser Carter Page at length in Russia probe," *Washington Post*, June 26, 2017. [https://www.washingtonpost.com/world/national-security/fbi-has-questioned-trump-campaign-adviser-carter-page-at-length-in-russia-probe/2017/06/26/1a271dcc-5aa5-11e7-a9f6-7c3296387341\\_story.html](https://www.washingtonpost.com/world/national-security/fbi-has-questioned-trump-campaign-adviser-carter-page-at-length-in-russia-probe/2017/06/26/1a271dcc-5aa5-11e7-a9f6-7c3296387341_story.html)